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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
AT SAN FRANCISCO**

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO,  
et al.,

Plaintiffs,

v.

UNITED STATES OFFICE OF  
PERSONNEL MANAGEMENT, et al.,

Defendants.

NO. 3:25-cv-01780-WHA

[CORRECTED PROPOSED] ORDER  
GRANTING PLAINTIFF STATE OF  
WASHINGTON'S MOTION FOR  
PRELIMINARY INJUNCTION

APRIL 9, 2025, 8:00 AM

The State of Washington's motion for a preliminary injunction came before this Court for consideration on \_\_\_\_\_, 2025. Upon consideration, and for good cause shown, IT IS HEREBY ORDERED that the motion is GRANTED.

This Court has subject matter jurisdiction to hear the State of Washington's claims, because the State has demonstrated Article III standing. The Court finds that the State of

1 Washington has demonstrated a likelihood of success on the merits of its claims, a likelihood of  
2 irreparable harm in the absence of preliminary injunctive relief, that the balance of equities tips  
3 in the State's favor, and that the public interest favors preliminary injunctive relief.

4 Accordingly, IT IS HEREBY ORDERED that the relief this Court previously awarded  
5 to organizational Plaintiffs in its amended Temporary Restraining Order dated March 13, 2025,  
6 Dkt. No. 44, and in its oral and written decisions granting preliminary injunctive relief, Dkt. Nos.  
7 120, 132, extends to the State of Washington.

8 It is FURTHER ORDERED that relief Defendants the Department of Agriculture, the  
9 Department of Commerce, the Department of Defense, the Department of Education, the  
10 Department of Health and Human Services, the Department of Homeland Security, the  
11 Department of Housing and Urban Development, and the Department of the Interior shall  
12 comply with all provisions of this Order, including immediately offering reinstatement to any  
13 and all probationary employees terminated since January 20, 2025, ceasing any and all use of  
14 the template termination notice provided by Defendant OPM and/or Acting Director Ezell since  
15 January 20, 2025, immediately advising all probationary employees terminated since January  
16 20, 2025, that the notice and termination has been found to be unlawful by the United States  
17 District Court for the Northern District of California, and ceasing any termination of  
18 probationary employees at the direction of defendants OPM and Acting Director Ezell. Any  
19 terminations of these agencies' employees may only be made by the agencies themselves in  
20 conformity with the Civil Service Reform Act and the Reduction in Force Act and any other  
21 Constitutional or statutory requirement. In seven calendar days, relief Defendants Department  
22 of Commerce, Department of Education, Department of Health and Human Services,  
23

1 Department of Homeland Security, and Department of Housing and Urban Development shall  
2 submit a list of all probationary employees terminated since January 20, 2025, with an  
3 explanation as to each of what has been done to comply with this Order.

4 This Order does not supersede any reporting or compliance required by any other order  
5 of this Court.

6 IT IS SO ORDERED.

7 DATED this \_\_\_\_ day of \_\_\_\_\_ 2025.

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HONORABLE WILLIAM ALSUP  
United States District Judge

11 Presented by:

12 NICHOLAS W. BROWN  
13 Attorney General

14 /s/ Cynthia L. Alexander  
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